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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SEYED RIAZI,

Plaintiffs,

vs.

EQUIFAX INFORMATION SERVICES LLC;
EXPERIAN INFORMATION SOLUTIONS,
INC.; and I.C. SYSTEM, INC,

Defendants.

Case No.: 2:18-cv-02276-KJD-CWH

**(PROPOSED) STIPULATION AND
ORDER TO EXTEND DISCOVERY**

(FIRST REQUEST)

Pursuant to Fed. R. Civ. P. 26(f), and Local Rule 26-1, Plaintiff Seyed Riazi (“Plaintiff”),
Defendant Equifax Information Services LLC (“Equifax”); and I.C. System, Inc (“IC System”);

(Proposed) Stipulation and Order to Extend Discovery - 1

(collectively the “Parties”), by and through their attorneys, hereby stipulate to extend discovery deadlines and other deadlines in the February 26, 2019 Scheduling Order as follows:

1. Initial Disclosures.

The parties do not propose any changes to the form of disclosures required pursuant to Federal Rule 26(a). The Parties already served their initial disclosures.

2. Completed Discovery.

Plaintiff served discovery requests upon Equifax on February 14, 2019. Plaintiff also served discovery requests upon IC System on February 22, 2019. Both Defendants responded to Plaintiff’s discovery requests on March 22, 2019.

3. Remaining Discovery

The Parties anticipate at least one deposition, IC System’s 30(b)(6) deponent. This deposition was originally noticed for April 3, 2019. On April 2, 2019, IC System made Plaintiff aware of its unavailability for that date. As such, Plaintiff served an Amended Notice of Deposition as to IC System’s 30(b)(6) deponent on April 3, 2019, for the mutually agreed upon date of May 3, 2019. Plaintiff also intends to subpoena documents from and depose third party Seton Edgar B. Davis’s 30(b)(6) witness. Plaintiff further intends to explore this information through expert testimony.

4. Good Cause.

On the eve of deposition, IC System informed Plaintiff that it was not available for its deposition. Plaintiff worked with IC System’s counsel to find a new date, which is May 3, 2019. The Parties need to extend the current deadlines to preserve Plaintiff’s rights in place at the original deposition date.

Accordingly, the Parties are requesting this extension for good cause. Despite Plaintiff’s diligence, given these reasonable delays, the deposition cannot be held before the current amend deadline. *See Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604, 607 (9th Cir. 1992). The parties were diligent in seeking an amendment once they reasonably knew that they could not

1 comply with the scheduling order. *See Eckert Cold Storage, Inc. v. Behl*, 943 F. Supp. 1230,
2 1233 (E.D. Cal. 1996). Specifically, the amend deadline is currently April 16, 2019, and the
3 parties are filing this stipulation on April 8, 2019, promptly after the re-noticing of IC System's
4 deposition. This amended stipulation is made in good faith, is not interposed for delay, and is
5 not filed for an improper purpose.

6
7 **5. Current Discovery Deadlines.**

8 WHEREAS, discovery currently concludes on July 15, 2019, the Parties plan to complete
9 the above discovery on the following schedule:

- 10 • Discovery Cutoff: July 15, 2019
- 11 • Amending Pleadings/Adding Parties: April 16, 2019
- 12 • Initial Expert Disclosures and Interim Status Report: May 16, 2019
- 13 • Rebuttal Expert Disclosures: June 17, 2019
- 14 • Dispositive Motion deadline: August 14, 2019
- 15 • Joint Proposed Pretrial Order: September 13, 2019

16 **6. Proposed Discovery Deadlines.**

17 WHEREAS, no prejudice will occur to this Court or the Parties if granted, good cause
18 supports this request to extend discovery;

19 NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS
20 HEREBY STIPULATED AND AGREED, by and between the Parties as follows:

21 The February 26, 2019 Scheduling Order shall be amended as follows:

- 22 • Discovery Cutoff: August 19, 2019
- 23 • Amending Pleadings/Adding Parties: May 20, 2019
- 24 • Initial Expert Disclosures and Interim Status Report: June 20, 2019
- 25 • Rebuttal Expert Disclosures: July 22, 2019
- 26 • Dispositive Motion deadline: September 18, 2019
- 27 • Joint Proposed Pretrial Order: October 18, 2019

IT IS SO STIPULATED.

Dated April 9, 2019.

KNEPPER & CLARK LLC

/s/ Shaina R. Plaksin

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Counsel for Defendant
I.C. System, Inc.

ORDER GRANTING

STIPULATION TO EXTEND DISCOVERY

IT IS ORDERED THAT the February 26, 2019 Scheduling Order shall be amended as follows:

- Discovery Cutoff: **August 19, 2019**
- Amending Pleadings/Adding Parties: **May 20, 2019**
- Initial Expert Disclosures and Interim Status Report: **June 20, 2019**
- Rebuttal Expert Disclosures: **July 22, 2019**
- Dispositive Motion deadline: **September 18, 2019**
- Joint Proposed Pretrial Order: **October 18, 2019**

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: April 11, 2019